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Hearing Date: Sept. 14, 2022
Opposition Date: June 17, 2022
Reply Date: July 29, 2022

Attorneys for Defendant Pierre Delandmeter

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

UBS AG, UBS EUROPE SE (f/k/a UBS
(LUXEMBOURG) SA), UBS FUND SERVICES
(LUXEMBOURG) SA, UBS THIRD PARTY
MANAGEMENT COMPANY SA, ACCESS
INTERNATIONAL ADVISORS LLC, ACCESS
INTERNATIONAL ADVISORS LTD., ACCESS
MANAGEMENT LUXEMBOURG SA (f/k/a
ACCESS INTERNATIONAL ADVISORS
(LUXEMBOURG) SA) as represented by its

Adv. Pro. No. 08-01789 (CGM)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04285 (CGM)

ORAL ARGUMENT REQUESTED

Liquidator MAITRE FERNAND ENTRINGER,
ACCESS PARTNERS SA as represented by its
Liquidator MAITRE FERNAND ENTRINGER,
PATRICK LITTAYE, CLAUDINE MAGON DE LA
VILLEHUCHET (a/k/a CLAUDINE DE LA
VILLEHUCHET) in her capacity as Executrix under
the Will of THIERRY MAGON DE LA
VILLEHUCHET (a/k/a RENE THIERRY DE LA
VILLEHUCHET), CLAUDINE MAGON DE LA
VILLEHUCHET (a/k/a CLAUDINE DE LA
VILLEHUCHET) individually as the sole beneficiary
under the Will of THIERRY MAGON DE LA
VILLEHUCHET (a/k/a RENE THIERRY DE LA
VILLEHUCHET), PIERRE DELANDMETER,
THEODORE DUMBAULD, LUXALPHA SICAV as
represented by its Liquidators MAITRE ALAIN
RUKAVINA and PAUL LAPLUME, MAITRE
ALAIN RUKAVINA AND PAUL LAPLUME, in
their capacities as liquidators and representatives of
LUXALPHA, , GROUPEMENT FINANCIER LTD.,

Defendants.

**NOTICE OF DEFENDANT PIERRE DELANDMETER'S
MOTION TO DISMISS SECOND AMENDED COMPLAINT**

PLEASE TAKE NOTICE that, upon defendant Pierre Delandmeter's
Memorandum of Law in Support of His Motion to Dismiss the Second Amended Complaint, the
accompanying Declaration of Pierre Delandmeter, dated April 22, 2022, and the exhibits
thereto, and all prior pleadings and proceedings herein, defendant Pierre Delandmeter
("Delandmeter") will move this Court on September 14, 2022, at 10:00 a.m. for an order
dismissing all claims against Delandmeter in the Second Amended Complaint filed by plaintiff
Irving H. Picard, Trustee (the "Trustee") for the Liquidation of Bernard L. Madoff Investment
Securities LLC and the Chapter 7 Estate of Bernard L. Madoff, pursuant to Federal Rules of
Civil Procedure 12(b)(2) and 12(b)(6), as made applicable by Rule 7012 of the Federal Rules of
Bankruptcy Procedure.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Stipulation and Order entered in this proceeding on January 20, 2022, the Trustee shall file any opposition to this motion by June 17, 2022 and Delandmeter shall file any reply by July 29, 2022.

PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 7012(b) of the Federal Rules of Bankruptcy Procedure, Delandmeter does not consent to the entry of final orders or judgment by this Court.

Dated: New York, New York
April 22, 2022

FRIEDMAN KAPLAN SEILER
& ADELMAN LLP

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